

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,	)	
	)	
Plaintiff,	)	
v.	)	<b>Case No. 11-CV-02448</b>
	)	<b>Judge Joan B. Gottschall</b>
BEONY INTERNATIONAL LLC,	)	
a California Limited Liability Company,	)	<b>Magistrate Judge Geraldine Soat Brown</b>
	)	
MARIO MILANOVIC,	)	
individually and as an owner and/or	)	
member of Beony International LLC, and	)	
	)	
CODY ADAMS,	)	
individually,	)	
Defendants.	)	

**FEDERAL TRADE COMMISSION’S MOTION FOR A TEMPORARY RESTRAINING ORDER WITH OTHER EQUITABLE RELIEF AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiff, Federal Trade Commission (“FTC”), having filed its Complaint seeking a permanent injunction and other relief, including restitution for consumers injured by Defendants’ unlawful practices, pursuant to Section 13(b) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 53(b), moves this Court with notice to Defendants for a Temporary Restraining Order With Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue (“TRO”).<sup>1</sup> A temporary restraining order is necessary to bring an immediate halt to Defendants’ ongoing deceptive practices that have likely injured thousands of

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<sup>1</sup> Plaintiff’s proposed TRO, and propose preliminary injunction, have been submitted to the Court with this motion.

consumers in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, to prevent further harm to the public, and to preserve the possibility of effective final relief.

Plaintiff seeks an Order:

1. Restraining Defendants from further violations of Section 5(a) of the FTC Act, 15 U.S.C. §§ 45(a);
2. Requiring Defendants to preserve assets and to provide the FTC with an accounting of them;
3. Requiring Defendants to post notice of this lawsuit on their websites;
4. Requiring Defendants to preserve records and to report new business activity;
5. Granting expedited discovery; and
6. Requiring Defendants to show cause why this Court should not issue a preliminary injunction extending such temporary relief pending an adjudication on the merits.

The FTC respectfully refers the Court to Plaintiff's Memorandum in Support of Plaintiff's Motion for a Temporary Restraining Order and supporting exhibits.

WHEREFORE, Plaintiff Federal Trade Commission respectfully requests that the Court grant its Motion for a Temporary Restraining Order.

Respectfully Submitted,

Dated: April 13, 2011

/s/ John C. Hallerud  
JOHN C. HALLERUD  
Attorney for Plaintiff  
Federal Trade Commission  
55 West Monroe Street, Suite 1825  
Chicago, Illinois 60603  
(312) 960-5634 (telephone)  
(312) 960-5600 (facsimile)  
[jhallerud@ftc.gov](mailto:jhallerud@ftc.gov) (email)